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January 28, 2014

Marlene H. Dortch, Secretary Federal Communications Commission 445 12<sup>th</sup> Street, S.W. Washington, DC 20554 Received & Inspected

FEB 03 2014

FCC Mail Room

RE: Certification of CPNI Filing (January 28, 2014)

EB-06-TC-060 EB Docket No. 06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-223, released January 30, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2013.

Respectfully submitted

J. Jeffrey Hutter Sr. President

Two-Way Radio Service, Inc. t/a TWR Communications

/attachments

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MAIN OFFICE

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## CPNI STATEMENT OF COMPLIANCE

Two-Way Radio Service, Inc. t/a TWR communications ("Carrier") has established operating procedures that ensure compliance with the Federal Communications Commission (the "Commission") regulations regarding the protection of customer proprietary network information ("CPNI") as set forth in the Commission's rules at 47 C.F.R. §§64.2001-2009.

Carrier has implemented a system whereby the status of a customer's CPNI approval can be clearly established prior to any use, disclosure, or access.

Carrier continually educates and trains its employees regarding the appropriate use and authorization of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.

Carrier maintains a record of its, and its affiliates, sales and marketing campaigns that use Carrier customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign and what products and services were offered as a part of the campaign. Carrier maintains these records for the minimum required period of one year.

Carrier has established a supervisory review process regarding Carrier compliance with the rules for outbound marketing situations. Specifically, Carrier sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval.

Carrier maintains confidentiality agreements pursuant to the Commission's CPNI rules with any joint venture partner and independent contractor.

Carrier has implemented a system whereby all CPNI notifications are provided to customers as required by the Commission's rules.

Carrier maintains records of all customer approvals and notifications for the minimum required period of one year.

## **CERTIFICATION**

I, J. Jeffrey Hutter, Sr. hereby certify the 28<sup>th</sup> day of January 2014 that I am President of Two-Way Radio Service, Inc. and that I have personal knowledge that Two-Way Radio Service, Inc. has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. 64.2001-2009.

Jeffrey Hutter, SR.